

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,  
vs. CRIMINAL NO.: 05-CR-1849 JH

DANA JARVIS, et al.,

Defendants.

**MOTION TO JOIN UNOPPOSED MOTION TO CONTINUE JAMES  
HEARING CURRENTLY SCHEDULED FOR JANUARY 26, 2009**

COMES NOW, George Osgood, by and through counsel of record, Amy Sirignano of the Law Office of Amy Sirignano, PC, in support of his Motion to Join the Government's Unopposed Motion to Continue *James* Hearing Currently Scheduled For January 26, 2009, and states the following:

1. Counsel was appointed to represent Mr. Osgood on January 14, 2009 (Doc. 1507).
2. Counsel for Mr. Osgood telephonically contacted AUSA James Braun on January 14, 2009. AUSA James Braun agreed that Ms. Sirignano needed time to speak to her client, review discovery, and the case against Mr. Osgood. (Doc 17).
3. Counsel for Mr. Osgood was notified that this Honorable Court has scheduled motions hearings on April 28, 2009 (Doc. 1455).
4. Counsel for Mr. Osgood requests ninety (90) days to review the 1500 pleadings filed in this case, obtain and review the relevant case discovery (which has been described as extensive), conduct an investigation, and draft Pre-Trial pleadings, if any, on behalf of Mr. Osgood.

For the foregoing reasons, defendant Osgood respectfully submits that the Court enter an Order continuing the *James* hearing on January 26, 2009, and that this Court grants counsel for Mr. Osgood ninety (90) days to review the pleadings in this case, obtain and review the relevant case discovery, conduct an investigation, and draft Pre-Trial pleadings.

Respectfully submitted,

/s  
Amy Sirignano, Esq.  
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(505) 242-2770  
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Attorney for Defendant

**CERTIFICATE OF SERVICE:**

I hereby certify that a copy of the foregoing pleading was sent via facsimile to opposing counsel, AUSA James Braun, this 15th day of January, 2009.

/s  
Amy Sirignano